



July 10, 2019

Ms. Marlene H. Dortch  
Secretary - Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**RE: *In the Matter of Universal Service Contribution Methodology:  
WC Docket No 06-122;***

Dear Ms. Dortch:

The Federal Communications Commission must address the unpredictable and insufficient levels of universal service support for Rate-of-Return carriers. This uncertainty has caused a decrease in network investment, is harming rural consumers and undercutting the goals of universal service; To ensure that all consumers have access to high-quality and affordable communications.

Given this urgency, we, OTA – The Oklahoma Rural Broadband Association, hereby fully support the Joint-Industry letter filed by the SHLB Coalition<sup>1</sup> opposing the proposal to place a cap on the Federal Universal Service Fund and respectfully submit this statement for the record in the above-captioned proceeding.

---

<sup>1</sup> Filed by the Schools, Health & Libraries Broadband Coalition; Universal Service Contribution Methodology, WC Docket No. 06-122; dated June 11, 2019.

3800 N Classen, Suite 215  
Oklahoma City OK 73118  
Tel: 405-525-7700 Fax: 405-525-7707  
Website: [oklata.org](http://oklata.org)

## **Introduction**

OTA – The Oklahoma Rural Broadband Association (OTA) represents thirty-three (33) member Rural Local Exchange Carriers (RLECs) and approximately ninety (90) Associate Member companies which provide products and services to the member companies. Located in predominately rural areas of Oklahoma, the OTA member companies not only provide essential communication services, but also provide much of the local leadership in their communities. OTA members serve on the local hospital, bank and school boards and fulfill many other civic roles throughout Oklahoma.

## **Discussion**

The Universal Service Fund provides RLECs funding to build out, maintain and improve their broadband offerings in the rural areas that need it most. The Broadband services that the RLECs provide ensures that rural schools throughout the country have high-speed Broadband connections for their students. The Lifeline program also depends heavily on these Broadband offerings to ensure connection to emergency services.

Recently, the FCC took great strides to create certainty by increasing the funding to almost full funding support for the High Cost portion of the Universal Service Fund. By implementing a cap on universal Service, we believe it would be a step backwards in the certainty that the recent order created. The cap would take us to a course that would limit Broadband in rural areas, limit high-speed Internet access in rural classrooms, shorten the reach of Telehealth and limit opportunities for those who need it most. It would almost certainly create a system that would harm rural Americans' ability to have access to reliable rural Broadband in any form. The proposal as it appears would pit all three programs (Lifeline, E-Rate and High Cost) against one another to receive the needed support. We believe that would not only decrease the certainty of funding but decrease the reliability in services provided as well.

OTA also wants to bring attention to a petition filed by Central Texas Telephone Cooperative, Inc., Peoples Telephone Cooperative, Inc., and Totelcom Communications, LLC<sup>2</sup>. The Petitioners are urging the FCC to consider amending Part 54 of the FCC's rules with respect to the E-Rate program's competitive bidding requirements, to include safeguards which would discourage overbuilding of existing federally supported fiber networks. Without these safeguards, RUS would be wasting E-rate funds to build fiber networks in areas that already have fiber.

### **Conclusion**

Imposing a cap on the Universal Service program's overall budget is not the right approach. Universal Service programs were created to ensure that rural Americans have access to voice and broadband services comparable to their fellow urban citizens at reasonable prices. Without these communications services, we risk leaving behind millions of Americans as our country tries to become a fully connected society.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Kuehny". The signature is fluid and cursive, with the first name "Jill" and last name "Kuehny" clearly distinguishable.

Jill Kuehny – President

OTA – The Oklahoma Rural Broadband Association

---

<sup>2</sup> Petition for Rulemaking of Central Texas Telephone Cooperative, Inc. et al., RM-11841; CC Docket No. 02-6; WC Docket No. 13-184 (filed May 22, 2019), <https://www.fcc.gov/ecfs/filing/10522043215849>



Atlas Telephone Company

Beggs Telephone Company, Inc.

BTC Broadband

Canadian Valley Telephone Company

Carnegie Telephone Company

Central Oklahoma Telephone Co., LLC

Cherokee Communications

Chickasaw Telephone Company

Craw-Kan Telephone Company

Cross Telephone Company

Dobson Telephone Company

Epic Touch Company

Grand Telephone Company, Inc.

Hinton Telephone Company, Inc.

KanOkla Networks

McLoud Telephone Company

Medicine Park Telephone Company, Inc.

OklaTel Communications, Inc.

Oklahoma Western Telephone Company

Ozark Telephone Company

Panhandle Telephone Cooperative, Inc.

Pine Telephone Company, Inc.

Pinnacle Communications

Pioneer Telephone Cooperative, Inc.

Santa Rosa Telephone Cooperative, Inc.

Seneca Telephone Company

Shidler Telephone Company

South Central Telephone Association, Inc.

Southwest Oklahoma Telephone Company

Terral Telephone Company

Totah Communications, Inc.

Valliant Telephone Company

Wyandotte Telephone Company